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Social Finance, Inc. d/b/a SoFi and
SoFi Lending Corp. d/b/a SoFi*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

RUBEN JUAREZ, CALIN CONSTANTIN
SEGARCEANU, EMILIANO GALICIA, and
JOSUE JIMENEZ, on behalf of themselves
and all others similarly situated,

Plaintiffs,

v.

SOCIAL FINANCE, INC. d/b/a SOFI, and
SOFI LENDING CORP. d/b/a SOFI,

Defendants.

Case No.: 4:20-cv-03386-HSG

**JOINT STIPULATION AND ORDER TO
SET SCHEDULE FOR SETTLEMENT
NOTICE, MOTIONS, AND FAIRNESS
HEARING**

District Judge: Haywood S. Gilliam, Jr.
Complaint filed: May 19, 2020
First Amended Complaint Filed: July 30, 2020
Second Amended Complaint Filed: May 3,
2021

Pursuant to Civil Local Rules 7-12 and the Court's Order Granting Preliminary Approval of the Settlement, ECF No. 101, Plaintiffs Ruben Juarez, Calin Constantin Segarceanu, Emiliano Galicia, and Josue Jimenez ("Plaintiffs"), through counsel, along with counsel for Defendants Social Finance, Inc. d/b/a SoFi and SoFi Lending Corp. d/b/a SoFi (collectively, "SoFi," and

together with Plaintiffs, the “Parties”), respectfully submit the following Joint Stipulation and proposed order to set the schedule of dates for the below-listed events.

RECITALS

WHEREAS, on April 20, 2022, Plaintiffs filed an Unopposed Motion for Preliminary Settlement Approval (“Plaintiffs’ Unopposed Motion”), ECF No. 93, attaching the Parties’ proposed Settlement Agreement and Class Notice, ECF No. 93-3;

WHEREAS, on October 24, 2022, Plaintiffs filed a Supplemental Memorandum in Support of Plaintiffs’ Unopposed Motion, ECF No. 96, amending the Class Notice and Claim Form to provide supplemental notice information in the Spanish language, ECF No. 97-3;

WHEREAS, on November 3, 2022, after the hearing on Plaintiffs’ Unopposed Motion, the Parties submitted a joint stipulation to amend the proposed Settlement Agreement and Class Notice to reflect that individuals wishing to opt out of the settlement will not be required to submit documentation reflecting their immigration status, ECF No. 100;

WHEREAS, the Court granted preliminary approval of the settlement with edits to the Class Notice and directed the Parties to stipulate to a schedule of dates to submit to the Court for:

- a) Deadline for Settlement Administrator to mail notice to all putative Class Members; b) Filing deadline for attorneys’ fees and costs motion; c) Filing deadline for incentive payment motion; d) Deadline for Class Members to opt-out or object to the settlement and/or application for attorneys’ fees and costs and incentive payment; e) Filing deadline for final approval motion; and
- f) Final fairness hearing and hearing on motions, ECF No. 101;

WHEREAS, the Parties affirm that no party will be prejudiced by this Joint Stipulation;

STIPULATION

THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiffs and SoFi through their respective undersigned counsel the following schedule:

Event	Date
Deadline for Settlement Administrator to mail notice to all putative Class Members	January 20, 2023
Filing deadline for attorneys’ fees and costs motion	January 20, 2023
Filing deadline for incentive payment motion	January 20, 2023

Deadline for Class Members to opt-out or object to settlement and/or application for attorneys' fees and costs and incentive payment, at least 45 days after the filing of the motion for attorneys' fees and incentive payments	March 6, 2023
Filing deadline for final approval motion	April 27, 2023
Final fairness hearing and hearing on motions	May 11, 2023

IT IS SO STIPULATED.

OUTTEN & GOLDEN LLP

Dated: December 22, 2022

By: /s/ Ossai Miazad

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Josue Jimenez and the Class

MCGUIRE WOODS LLP

Dated: December 22, 2022

By: /s/ K. Issac deVyver

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Attorneys for Defendants


Social Finance, Inc. d/b/a SoFi and

SoFi Lending Corp. d/b/a SoFi

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED,

DATED: 12/27/2022,


HAYWOOD S. GILLIAM, JR.
United States District Judge